

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

LOGAN IRELAND, and NICHOLAS BEAR
BADE,

Plaintiffs,

v.

PETER B. HEGSETH, in his official capacity as Secretary of Defense; THE UNITED STATES OF AMERICA; GARY ASHWORTH, in his official capacity as Acting Secretary of the Air Force; THE UNITED STATES DEPARTMENT OF THE AIR FORCE;

Defendants.

Civil A. No. 25-cv-01918-CPO-AMD

**AMENDED DECLARATION OF
JOHN S. STAPLETON IN SUPPORT
OF PLAINTIFFS' APPLICATION
FOR TEMPORARY RESTRAINING
ORDER**

I, John S. Stapleton, upon personal knowledge, hereby declare:

1. I am an attorney-at-law of good standing in the State of New Jersey and am admitted to practice in the federal District of New Jersey.
2. I am a partner of the firm Stapleton Segal Cochran LLC, counsel (together with attorneys from the law firm Langer Grogan & Diver P.C., the GLBTQ Legal Advocates & Defenders, and National Center for Lesbian Rights) for Plaintiffs in the above-captioned matter.
3. I provide this declaration in support of Plaintiffs' Application for a Temporary Restraining Order.
4. My March 18, 2025, Declaration (Dkt. 4-2) included a link to true and correct copies of the below-listed documents, and further noted that hard copies of any and all of the listed documents upon the Court's request.
5. On March 18, 2025, the Court's staff requested hard copies of such materials.

6. To avoid any confusion regarding the state of the record, this Declaration now attaches directly on the Court's Electronic Case Filing system identical copies of all documents previously identified in, and available for downloading through, my March 18, 2025, Declaration.

7. The following table summarizes the short title of each document included in the database—and now attached to this Amended Declaration—and its corresponding exhibit number:

Exhibit	Title and Date of Document
A	“Assessing the Implications of Allowing Transgender Personnel to Serve Openly” (“RAND Study”), 2016
B	Directive-Type Memorandum, DTM 16-005, “Military Service of Transgender Service Members”
C	DoDI 6130.03 Vol. 1, effective May 6, 2018
D	Tweets of President Trump, July 26, 2017
E	White House Directive, August 25, 2017
F	Mattis Plan, February 2, 2018
G	Executive Order 14004, January 25, 2021
H	DoDI 1300.28, effective April 30, 2021
I	FAQ for Executive Order 14183, February 2025
J	Clare Sears, “This Isn’t the First Time Conservatives Have Banned Cross-Dressing in America,” March 15, 2023
K	“What Sex Does,” <i>The New York Review of Books</i> , May 27, 2022
L	“Healthcare Laws and Policies: Medicaid Coverage for Transgender-Related Health Care,” <i>Movement Action Project</i> , January 6, 2025
M	“States Passed a Record Number of Transgender Laws. Here’s What They Say,” <i>The New York Times</i> , June 27, 2023
N	DoD Report and Recommendations on Military Service by Transgender Persons (“2018 Panel Report”), February 2018
O	“Implementing Guidance for Prioritizing Military Excellence and Readiness Executive Order,” (“Action Memo”), February 26, 2025
P	<i>Medical Aspects of Transgender Military Service</i> . Elders J, Brown GR, Coleman E, Kolditz TA, Medical Aspects of Transgender Military Service. Armed Forces and Society, 41(2): 199–220, 2015

Q	Vice Admiral Donald C. Arthur, USN (Ret.), Former Surgeon General of the U.S. Navy, et al., <i>DoD's Rationale for Reinstating the Transgender Ban is Contradicted by Evidence</i> , Palm Center, April 2018 (“Palm Center Report”)
R	Army Directive 2016-30, July 1, 2016
S	Army Directive 2016-35, October 7, 2016
T	“Young Americans’ Views on LGBTQ Rights,” (“PRRI Analysis”), April 9, 2024
U	DoDI 6130.03 Vol. 2, September 4, 2020
V	Air Force Policy Memo 2021-36-01, April 30, 2021
W	DoDI 1332.30, effective May 11, 2018
X	DoDI 1332.18, effective November 10, 2022
Y	DoDI 1332.14, effective August 1, 2024
Z	Hearing Transcript, March 12, 2025, 25-cv-00240-ACR

I declare under penalty of perjury that the foregoing is true and correct.

By: /s/ John S. Stapleton
John S. Stapleton

DATED: March 20, 2025

CERTIFICATE OF SERVICE

I, John S. Stapleton, certify that on this date, I caused the foregoing *Amended Declaration of John S. Stapleton in Support of Plaintiffs' Application for Temporary Restraining Order* to be served upon all counsel of record through the Court's ECF system.

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March 20, 2025

/s/ John S. Stapleton
John S. Stapleton